UNITED STATES BANKRUPTCY COURT

		Γ OF PENNSYLVANIA HIA DIVISION
IN RE: JOSEPH COLUCCI DEBTOR)))	CASE NO. 19-16972-AMC CHAPTER 13

NOTICE OF APPEARANCE PURSUANT TO BANKRUPTCY RULE 9010 (b) AND REQUEST FOR NOTICES UNDER BANKRUPTCY RULE 2002 REGARDING PROPERTY DESCRIBED AS 9315 RISING SUN AVE, PHILADELPHIA, PA 19115 AND THAT CERTAIN LOAN MORE SPECIFICALLY IDENTIFIED AS LOAN NUMBER *****3123

NOW COMES Freedom Mortgage Corporation, by and through its attorney Brock and Scott, PLLC, pursuant to Bankruptcy Rule 9010 and makes its appearance as a secured creditor in this cause and, pursuant to Bankruptcy Rule 2002, requests that it be noticed on all pleadings, documents and hearings; that it receive copies of all documents; and be added to the matrix to be served at the addresses below:

Andrew Spivack Brock and Scott, PLLC Attorneys at Law 302 Fellowship Road, Suite 130 Mount Laurel, NJ 08054 PABKR@brockandscott.com

Freedom Mortgage 10500 Kincaid Drive Fishers, Indiana 46037

Please take notice that the undersigned hereby appears as counsel for Freedom Mortgage

Corporation pursuant to Bankruptcy Rule 9010(b). The undersigned's filing of this notice is limited to the instant case noted above and should not be construed as unlimited representation of the

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Creditor with respect to any and all matters, proceedings, or actions that may be taken in the instant case or any associated case or proceeding involving the above-named Creditor.

RESPECTFULLY SUBMITTED,

1st Andrew Spinack

Andrew Spivack Attorney at Law (84439) Brock & Scott, PLLC 302 Fellowship Road, Suite 130 Mount Laurel, NJ 08054 844-856-6646 x3017 704-369-0760 PABKR@brockandscott.com

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the foregoing Notice of Appearance has been electronically served or mailed, postage prepaid on <u>January 27, 2021</u> to the following:

JOSEPH COLUCCI 9315 RISING SUN AVE PHILADELPHIA, PA 19115-3716

Michael Seth Schwartz, Debtor's Attorney msbankruptcy@verizon.net

William C. Miller, Bankruptcy Trustee Chapter 13 Trustee PO Box 1229 Philadelphia, PA 19105

United States Trustee, US Trustee Office of the U.S. Trustee 200 Chestnut Street, Suite 502 Philadelphia, PA 19106

1s/ Andrew Spirack

Andrew Spivack
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